

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

----- X
FARRAH KULE-RUBIN, LANA RYBAK, SHEILA YEN-
PFISTER, JEANETTE PENALVER, REBECCA
SCHLOSSBERG, TIEU PHAN CHAN, LAI WAN NG,
SHAOLI HU ZHANG, CLAUDETTE JEAN-BAPTISTE,
MOON CHAN and FUN YIM NG,

Plaintiffs,

- against -

BAHARI GROUP LIMITED; REZA BAHARI, in his
individual and official capacities; FATTANEH BAHARI, in
her individual and official capacities; and "JOHN DOES 1
through 5," whose names are not currently known, in their
individual and official capacities,

Defendants.
----- X

Civil Action No.:
11 CIV 2424 (TPG) (JLC)

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the annexed Declaration of David E. Gottlieb and Memorandum of Law in support of Plaintiffs' Motion to Compel, Plaintiffs' Farrah Kule-Rubin, Lana Rybak, Sheila Yen-Pfister, Jeanette Penalver, Rebecca Schlossberg, Tieu Phan Chan, Lai Wan Ng, Shaoli Hu Zhang, Claudette Jean-Baptiste, Moon Chan, Fun Yim Ng; Plaintiffs move this Court before the Honorable Judge Thomas P. Griesa, at the United States Courthouse, 500 Pearl St., New York, NY 10007, to compel Defendants to respond to interrogatories.

Dated: New York, New York
November 13, 2012

THOMPSON WIGDOR LLP

By: 

David E. Gottlieb

85 Fifth Avenue
New York, NY 10003
Telephone: (212) 257-6800
Facsimile: (212) 257-6845
dgottlieb@thompsonwigdor.com

Counsel for Plaintiffs